

Get Your Title III Plan & Budget Approved Timely

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Guiding Principles

- Develop a Balanced Plan
 - Conduct a comprehensive needs assessment
 - Include objectives, strategies and activities
 - Align budget to plan
- Adhere to the three questions (OMB)

Criteria for Using Federal Funds

reasonable

A cost is reasonable if, in its nature and amount, it does not exceed that which would be incurred by a prudent person under the circumstances prevailing at the time the decision was made to incur the cost.

allocable

A cost is allocable to a cost objective if the goods or services involved are chargeable or assignable to the cost objective in accordance with the relative benefits received.

allowable

A cost is allowable if it is necessary and reasonable for proper and efficient performance of the award and allocable to the award. **(OMB Circular A-87)**

Guiding Principles, Continued...

- Implement an Instructional Design:
 - Research based (including software)
 - Used ***only*** with ELs
 - Supplemental to basic & alternative language programming/instruction

Guiding Principles, Cont'd

- Develop Professional Development:
 - Focused on language & content instruction
 - ***Only*** for teachers of ELs Systemic, systematic and job embedded
 - Evaluated annually



Guiding Principles

- Hire Staff:
 - Supplemental
 - Supervised (paraprofessionals)
 - Highly qualified with ongoing research-based staff development
 - Acts as a resource/instructional coach
 - Non-administrative role

Guiding Principles, Cont'd

- Plan Parent Engagement:
 - Guided by parental input & active participation
 - Supplemental to, and well coordinated with Title I, Part A policy & plan
 - Aligned to students' objectives
 - Evaluated annually

Title III 2% Cap on Administrative & Indirect Costs

- LEAs have a limit of 2% of the Title III subgrant for administration. (section 3115(b))
- The 2% administrative cap must include both administrative costs + indirect costs.
- Administrative costs are associated with overall project management and administration and are not directly related to the provision of services or otherwise allocable to program cost objectives/categories.
- Indirect costs represent the expenses of doing business that are not readily identified with a particular grant, but are necessary for the general operation of the organization.

Administrative Costs

- Types of administrative costs:
 - personnel & non-personnel
 - direct & indirect
- Administrative costs include those activities that pertain to establishing and administering policy for operating the LEA or with handling the overall administrative responsibilities for an LEA and program.

Examples: Personnel – salaries & benefits for office assistants, clerks, accounting, data processing, contracted professional services, such as auditors

(Source: 1997 USDOE Indirect Cost Determination Guidance for State and Local Government Agencies)

What are Indirect and Direct Costs?

Indirect costs represent the expenses of doing business that are not readily identified with a particular grant, contract, project function or activity, but are necessary for the general operation of the organization and the conduct of activities it performs.

Direct costs can be identified specifically with particular cost objectives such as a grant, contract, project, function or activity. Direct costs usually include:

- Salaries and wages (including vacations, holidays, sick leave, and other excused absences of employees working specifically on objectives of a grant or contract – i.e., direct labor costs).
- Other employee fringe benefits allocable on direct labor employees.
- Consultant services contracted to accomplish specific grant objectives.
- Travel of employees.
- Materials, supplies and equipment purchased directly for use on a specific grant or contract.
- Communication costs such as long distance telephone calls identifiable with a specific award or activity.

(Source: USDE OCFO FAQs:

<http://www2.ed.gov/about/offices/list/ocfo/fipao/abouticq.html>)



Let's Discuss!

Common questions
and best practices



Supplement, not Supplant Requirement - General

- Title III funds must be used to supplement the level of Federal, State and local funds that, in the absence of Title III funds, would have been expended for programs for limited English proficient (LEP) students and immigrant children and youth.

(section 3115(g))

- Any determination about supplanting is fact-specific, and it is difficult to provide general guidelines without examining the details of a situation.

Supplement, not Supplant Requirement - General

1. What is the instructional program/service provided to all students?
2. What does the LEA do to meet Lau requirements?
3. What services is the LEA required by other Federal, State, and local laws or regulations to provide?
4. Was the program/service previously provided with State, local, and Federal funds?

Supplement, not Supplant Requirement - General

Based on the answers to the above questions, would the proposed funds be used:

- to provide an instructional program/service that is in addition to or supplemental to an instructional program/service that would otherwise be provided to LEP students (or be required to be provided by other laws/regulations) in the absence of a Title III grant?

Layers of Education & Supports for ELL

4th – ALTERNATIVE Title III **supplemental** services beyond the 1st & 2nd layers: must include additional direct instruction that helps close the achievement gap, professional development, and parent outreach

3rd – Supplemental support from Title I and 31 Aa

2nd – OCR mandated alternative language program that provides students English language instruction and meaningful access to the core curriculum (1st layer)

1st – Basic, local board adopted curriculum that all students receive.

LEA General Fund
Responsibility



Supplement, not Supplant Requirement - General

The First Test of Supplanting: Required by Law

The Department assumes supplanting exists if –
An LEA uses Title III funds to provide services that the LEA is required to make available under State or local laws, or other Federal laws.

The Second Test of Supplanting: Prior Year

The Department assumes supplanting exists if –
An LEA uses Title III funds to provide services that the LEA provided in the prior year with State, local or other Federal funds.

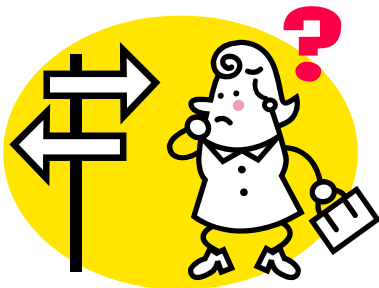
This assumption can be rebutted.

To refute the “prior year” test of supplanting, the LEA would need to have contemporaneous records to confirm...

- Budget cuts were made in a number of areas, not just services for LEP students; and,
- There was in fact a reduced amount of State or local funds to pay for this activity/position; and
- The LEA made the decision to eliminate the position/activity without taking into consideration Federal funds.

Scenario #1: Supplementing or Supplanting?

The LEA wishes to use Title III funds to hire a highly qualified bilingual/ESL Resource Teacher. Her role would be to provide direct support to ELs by conducting collaborative teaching in the general education classroom for one hour per class per day where ELs are placed.



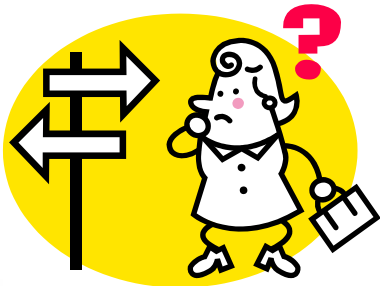
Scenario # 2: Supplementing or supplanting?

- Title III funds are used for identification & placement assessments for private school students (when the use of such funds would not supplant other Federal, State or local funds that may be used for such purposes.)



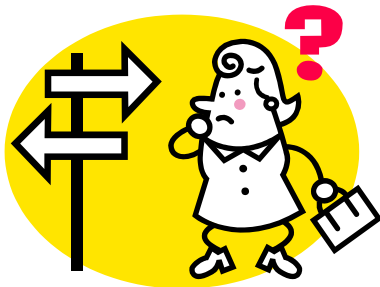
Scenario #3: Supplementing or Supplanting?

The LEA considers use of the Sheltered Instruction Observation Protocol (SIOP) as part of their best practices used to service all students. The LEA wishes to use Title III funds to cover the cost of professional development in SIOP.



Scenario # 4: Supplementing or supplanting

The LEA wishes to use Title III funds to hire and train bilingual/ESL instructional coaches.



Let's Discuss!

Common questions and best practices



Allowable or not? Why?

1. May I use Title III funds to pay for part of the salary of an administrator for a Title III-funded summer program?
2. May I carryover 50% of my budget?
3. May Title III funds be used to pay for students' transportation?
4. May I go over an approved line item in my budget?
5. May I use Title III money to fund a teacher for assessing potentially eligible ELs using ELPA?

Examples of Unallowable Costs –

- ☐ Alcoholic beverages;
- ☐ Donations and contributions
- ☐ Entertainment costs

-tickets to shows or sports events, meals, lodging, rentals, transportation, gratuities

MAY be Allowable—

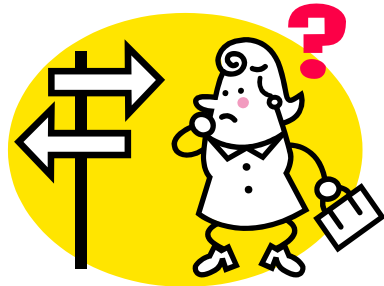
reasonable lunch/refreshments for parents or participants in a staff development activity, if there is no other opportunity to eat, and the activity is all day

MAY be allowable –

- reasonable snacks for students for Title III-funded extended day/year programs
- transportation for these programs, if needed and not provided by the district
- tickets and transportation for educational field trips, if part of high-quality language instruction educational program

Scenarios: Allowable or not?

- Our district was not able to purchase the lap tops approved in the original DIP/Title III plan (FC 125). Therefore, we decided to provide summer professional development to all staff on 'Academic Language Development' using these funds (FC 221).



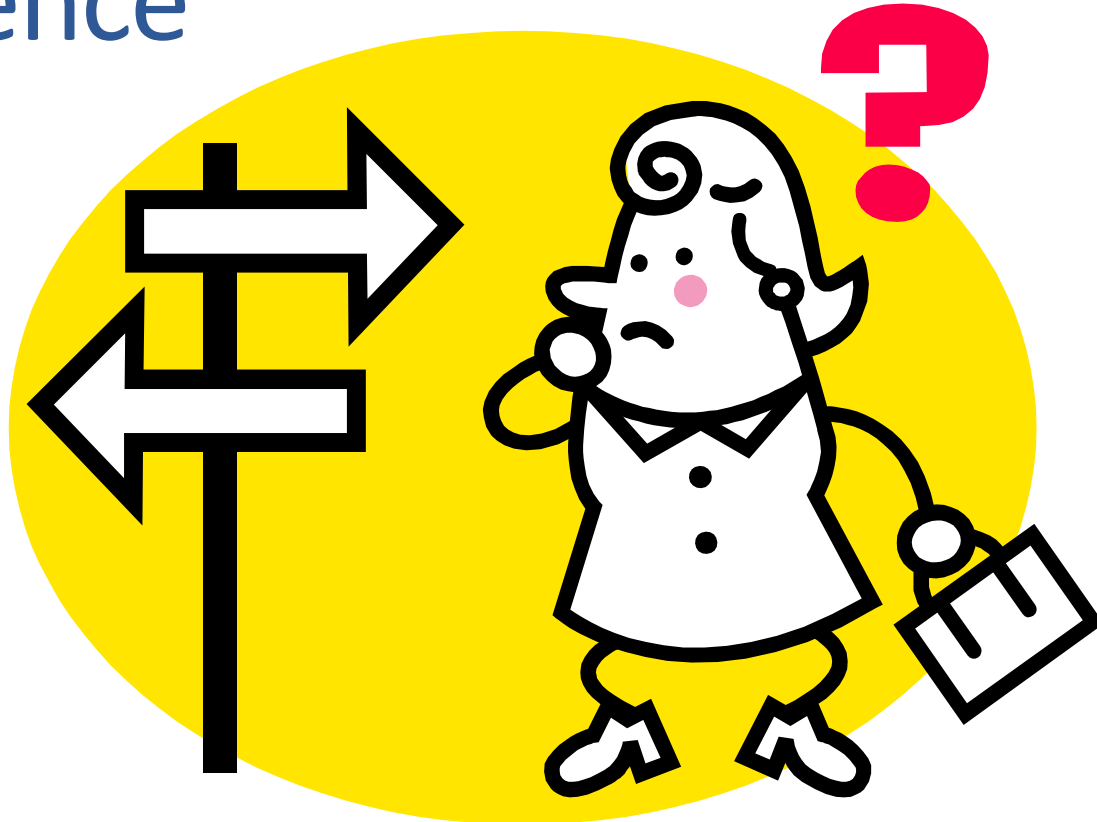
Allowable or not?

Our district wants to hire a Title III coach to provide systematic professional development to all teachers in sheltered instruction;

Additionally, this coach will also provide direct instruction to English learners three days/week



Scenarios/Questions from the audience



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